

DOCKET FILE COPY ORIGINAL

DOCKET FILE COPY ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

MAR 25 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Interconnection Between Local) CC Docket No. 95-185
Exchange Carriers and Commercial)
Mobile Radio Service Providers)

REPLY COMMENTS OF AMERITECH

I. Introduction

Ameritech submits its Reply Comments in this matter, noting that both the economic literature and the public policy arguments already on the record are nearly unanimous in their opposition to the Commission's tentative adoption of a "bill and keep" approach for interconnection arrangements between local exchange carriers ("LECs") and commercial mobile radio service ("CMRS") providers.¹ Such an unjustified departure from the cost-based interconnection model already chosen by the Federal Communications Commission ("Commission") would be a clear signal supporting the uneconomic practice of arbitrage. Negotiated interconnection agreements between LECs and CMRS providers continue to offer the most effective means to achieve the Commission's policy goals, and should remain the favored means of implementing fully-effective interconnection among and between networks.

¹ In the Matter of Interconnection Between Local Exchange Carriers and Commercial Mobile Radio Service Providers, CC Docket No. 95-185, CC Docket No. 94-54, Notice of Proposed Rulemaking, rel. January 11, 1996 (hereinafter "NPRM"), at 20 (¶ 39).

Original rec'd

Q11

II. Bill and keep would create incentives for uneconomic deployment

A number of commenting parties aptly noted that the adoption of a bill and keep approach to LEC-to-CMRS interconnection would provide strong financial incentives for CMRS providers to deploy systems and equipment so as to maximize their "take" under this regime. For example, CMRS providers would have massive financial incentives to design and deploy their infrastructures so as to maximize the subsidy they receive from interconnecting with LECs, to whom they would owe no compensation for terminating traffic originated by CMRS customers.² The complete avoidance of access charges is another obvious possibility under such a regime.³ The cost-based mutual compensation model already chosen by the Commission, and recently required by Congress would not permit such "gaming" of the process.

It was for this reason that, in enacting the Telecommunications Act of 1996, Congress specifically provided for a cost-based approach to LEC interconnection with all telecommunications carriers.⁴ If the Commission were to create a special subsidy for CMRS providers in the form of a bill and keep regime, this would create a new, more insidious opportunity for CMRS providers to benefit from arbitrage. Depending upon the design, capacity and other parameters at any given point within its network, a

² See, e.g., Comments of Pacific Bell, Pacific Bell Mobile Services and Nevada Bell, at 11-13 (noting that AT&T Wireless and Sprint -- two of the largest winners at the Commission's broadband PCS auctions -- could switch large volumes of their long distance traffic to their own MTSOs, and then terminate that traffic absolutely free by sending it to LEC who would receive absolutely no compensation).

³ See, Comments of LDDS, at 11-13 (CMRS providers could terminate interLATA traffic to an affiliated entity, avoiding access charges completely, and leading to severe uneconomic distortions in the overall interstate access market).

⁴ Telecommunications Act of 1996 (hereinafter "Act"), 47 USC §252.

CMRS provider would quite logically demand either interconnection on a bill and keep basis as the Commission would allow, or on a cost-recovery basis as required by the Act. Thus, CMRS providers would enjoy the best of all possible worlds at the sole expense of the customers of interconnecting LECs.”⁵

The problem of arbitrage is of particular concern in the emerging “one-stop-shopping” environment. The distinguishable categories of service providers which characterized the telecommunication marketplace of five years ago are now blurred together, and a single entity may well offer interexchange, local exchange, cellular, PCS, and other services.⁶ From a technical standpoint, the types of traffic exchanged among all these types of service providers are indistinguishable. Adopting different compensation arrangements for different categories of traffic would virtually guarantee economically inefficient arbitrage.

III. The economic literature opposes “bill and keep” in the LEC-to-CMRS context

The Commission should take special note of the virtually complete absence in the Comment cycle of any new economic materials in support of the tentative conclusion of

⁵ This clearly unjust result would doubtless be embraced by at least one party, who declared that “the 1996 Act clearly establishes the treatment of the incumbent LEC network as a resource for the use of other telecommunications carriers (Comments of CompTel, at 3). Hopefully, the Commission does not share that vision.

⁶ For example, SBC Mobile, AT&T and MCI have all been certified to provide local exchange service within areas also served by Ameritech.

the NPRM⁷ that a bill and keep approach would be appropriate in the instant situation.⁸ This result is not particularly surprising, in that the basic bill and keep concept is by design an economically-inefficient substitute for the workings of the marketplace. Nor was it argued in the Comments of any party that the two acknowledged factual predicates for the application of bill and keep -- balanced traffic flows between the carriers, and a near-zero interconnection cost⁹ -- are present in the LEC-to-CMRS interconnection context. Even the economists hired by the strongest advocates of bill and keep were forced to admit that traffic imbalances exist,¹⁰ and that LEC costs for termination of CMRS-customer originated traffic are, in fact, greater than zero.¹¹ Based on this record, the Commission should find specifically that adoption of a bill and keep approach is not justified.

⁷ NPRM, at 20 (¶ 39).

⁸ The only such evidence offered in support of bill and keep was paid for by AT&T Wireless (Affidavit of Bruce Owen of "Economists, Incorporated"), and CTIA (Affidavit of Brenner and Mitchell of Charles River Associates).

⁹ NPRM, at 30 (¶ 61).

¹⁰ Brenner & Mitchell affidavit of CTIA, at 19 (terminations on the LEC exceed terminations on cellular by 3:1); Owen affidavit of AT&T Wireless, at 7 (carriers' pricing policies could easily change in the future, in ways that affect the relative balance of traffic).

¹¹ Brenner & Mitchell affidavit of CTIA, at 25-28 (interconnection prices should be set equal to marginal or incremental cost without recognition of joint and common costs). Owen affidavit of AT&T Wireless, at 8 (costs are likely to be "modest").

IV. Conclusion

For the foregoing reasons, the Commission should maintain its cost-based approach to interconnection, and permit negotiated interconnection arrangements to continue to drive the timely and efficient deployment of network capacity and capabilities. The forces of a competitive marketplace have produced the modern and efficient network of networks from which all American telecommunications consumers benefit today. These same forces should be permitted to continue in full force,¹² unfettered by an artificial regulatory construct that advantages the few at the undeniable expense of the many.

Respectfully submitted,



Frank Michael Panek
Attorney for Ameritech
Room 4H84
2000 West Ameritech Center Drive
Hoffman Estates, IL 60196-1025
(847) 248-6064

Dated: March 25, 1996

¹² As foreshadowed in its Comments in this proceeding (Comments of Ameritech at 5), Ameritech and a major national CMRS provider have executed a formal interconnection agreement providing for a discrete cost-based mutual compensation element. This agreement between the parties is the product of vigorous negotiation, and reconfirms the fact that the marketplace operates best when regulators simply let it work.

CERTIFICATE OF SERVICE

I, Deborah L. Simmons do hereby certify that a copy of the foregoing Reply Comments of Ameritech has been served on all parties of record, via first class mail, postage prepaid, on this 25th day of March 1996.

By: Deborah Simmons /tra
Deborah L. Simmons

David A. Gross
Kathleen Q. Abernathy
AIRTOUCH COMMUNICATIONS, INC.
1818 N Street, N.W.
Suite 800
Washington, D.C. 20036

Michael Mowrey
Pamela Riley
AIRTOUCH COMMUNICATIONS, INC.
One California Street
San Francisco, CA. 94105

Anne Schelle
Vice President, External Affairs
AMERICAN PERSONAL
COMMUNICATIONS
6901 Rockledge Drive
Suite 600
Bethesda, MD. 20817

Jeffrey S. Linder
Attorney for
AMERICAN PERSONAL
COMMUNICATIONS
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

Alan R. Shark, President
Elizabeth R. Sachs, Esq., Attorney for
AMERICAN MOBILE
TELECOMMUNICATIONS ASSOC., INC.
Lukas, McGowan, Nace & Guterrez
1111 19th Street, N.W.
Suite 1200
Washington, D.C. 20036

Charles H. Helein, General Counsel
AMERICA'S CARRIERS
TELECOMMUNICATION ASSN.
Helein & Associates
8180 Greensboro Drive
Suite 700
McLean, VA. 22102

Glenn S. Rabin, Federal Regulatory Counsel
ALLTEL CORPORATE SERVICES, INC.
655 15TH Street, N.W.
Suite 220
Washington, D.C. 20005

David M. Wilson, Esq.
Attorney for
THE ALLIED PERSONAL
COMMUNICATIONS INDUSTRY
ASSOCIATION OF CALIFORNIA
Young, Vogl, Harlick, Wilson & Simpson
425 California Street, Suite 2500
San Francisco, CA. 94104

James G. Pachulski
Attorney for
THE BELL ATLANTIC TELEPHONE
COMPANIES
1320 North Court House Road
Eighth Floor
Arlington, VA. 22201

John T. Scott, III
Attorney for
BELL ATLANTIC NYNEX MOBILE, INC.
Crowell & Moring
1001 Pennsylvania Avenue, NW
Washington, D.C. 20004-2595

S. Mark Tuller, Vice President,
Legal and External Affairs, General Counsel
and Secretary
BELL ATLANTIC NYNEX MOBILE, INC.
180 Washington Valley Road
Bedminster, NJ. 07921

Barry R. Rubens, Senior Vice President Finance
& External Affairs
CONCORD TELEPHONE COMPANY
68 Cabarrus Avenue East
P. O. Box 227
Concord, NC. 28026-0227

Richard Myers
Attorney for
ALASKA-3 CELLULAR LLC
DBA CELLULAR ONE
Myers Keller Communications Law Group
1030 15th Street, N.W.
Suite 908
Washington, D.C. 20005

Thomas Gutierrez
Attorney for
CMT PARTNERS
Lukas, McGowan, Nace & Gutierrez,
Chartered
Suite 1200
1111 Nineteenth Street, N.W.
Washington, D.C. 20036

Adam A. Anderson, Senior Counsel
CMT PARTNERS
651 Gateway Boulevard
15th Floor
South San Francisco, CA. 94080

Frederick M. Joyce
Any Brett
Attorneys for
CELPAGE, INC.
Joyce & Jacobs, Attys. at Law, LLP
1019 19th Street, N.W.
14th Floor, PH-2
Washington, D.C. 20036

Werner K. Hartenberger
Laura H. Phillips
Richard S. Denning
Christina H. Burrow, Attorneys for
COX ENTERPRISES, INC.
Dow, Lohnes & Albertson
1200 New Hampshire Ave., N.W., Suite 800
Washington, D.C. 20036-6802

Susan W. Smith
Director, External Affairs
CENTURY CELLUNET, INC.
3050 Summerhill, #4
Texarkana, TX. 75501

Reginald J. Smith, Chairperson
CONNECTICUT DEPARTMENT OF PUBLIC
UTILITY CONTROL
One Central Park Plaza
New Britain, CT. 06051

Michael J. Shortley, III
Attorney for
FRONTIER CORPORATION
180 South Clinton Avenue
Rochester, NY. 14646

Gail L. Polivy
Andre J. Lachance
Attorneys for
GTE SERVICE CORPORATION
1850 M Street, N.W.
Suite 1200
Washington, D.C. 20036

Richard McKenna, HQE03J36
Attorney for
GTE SERVICE CORPORATION
P. O. BOX 152092
Irving, TX. 75015-2092

John A. Malloy, Esq.
Vice President and General Counsel
Leo R. Fitzsimon, Esq.
GO COMMUNICATIONS CORPORATION
201 North Union Street
Suite 410
Alexandria, VA. 22314

Cheryl A. Tritt
Stephen J. Kim
Attorneys for ICO GLOBAL
COMMUNICATIONS LIMITED
Morrison & Foester, LLP
2000 Pennsylvania Avenue, N.W.
Suite 5500
Washington, D.C. 20006

Larry A. Blosser
Donald J. Elardo
Attorneys for
MCI TELECOMMUNICATIONS
CORPORATION
1801 Pennsylvania Ave., N.W.
Washington, D.C. 20006

Saul Fisher
Donald C. Rowe
Attorneys for
NYNEX
1111 Westchester Avenue
White Plains, NY. 10604

Robert S. Foosaner,
Senior Vice President-Government Affairs
Lawrence R. Krevor,
Director-Government Affairs
Laura L. Holloway, General Counsel
NEXTEL COMMUNICATIONS, INC.
800 Connecticut Avenue, N.W., Suite 1001
Washington, D.C. 20006

Jay L. Birnbaum
Jeffrey A. Brueggeman
Attorneys for
NEW PAR
Skadden, Arps, Slate, Meagher & Flom
1440 New York Avenue, N.W.
Washington, D.C. 20005

Richard A. Askoff
Attorney for
NATIONAL EXCHANGE CARRIER
ASSOCIATION, INC.
100 South Jefferson Road
Whippany, NJ. 07981

Mark J. Tauber
Mark J. O'Connor
Attorneys for
OMNIPOINT CORPORATION
Piper & Marbury, L.L.P.
1200 19th Street, N.W.
Seventh Floor
Washington, D.C. 20036

Judith St. Ledger-Roty
Jonathan E. Canis
Paul G. Madison
Attorneys for
PAGING NETWORK, INC.
Reed, Smith, Shaw & McClay
1301 K Street, N.W., Suite 1100-East Tower
Washington, D.C. 20005

Margaret E. Garber
Attorney for
PACIFIC BELL, PACIFIC BELL MOBILE
SERVICES and NEVADA BELL
1275 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

Michael S. Fox
Director, Regulatory Affairs
JOHN STAURULAKIS, INC.
6315 Seabrook Road
Seabrook, MD. 20706

Leon M. Kestenbaum
Jay C. Keithley
H. Richard Juhnke
SPRINT CORPORATION
1850 M Street, N.W.
Washington, D.C. 20036

Durward D. Dupre
Mary W. Marks
Darryl Howard
Attorneys for
SOUTHWESTERN BELL TELEPHONE CO.
One Bell Center
Room 3558
St. Louis, MO. 63101

Lucille M. Mates
Jeffrey B. Thomas
Sarah Rubenstein
Attorneys for PACIFIC BELL, PACIFIC BELL
MOBILE SERVICES and NEVADA BELL
140 New Montgomery Street
Room 1529
San Francisco, CA. 94105

Betty D. Montgomery, Atty. General of Ohio
Duane W. Luckey, Section Chief
Steven T. Nourse, Assistant Atty. General
Public Utilities Section
PUBLIC UTILITIES COMMISSION OF OHIO
180 East Broad Street
Columbus, OH. 43215-3793

Maureen O. Helmer,
General Counsel
NEW YORK STATE DEPARTMENT OF
PUBLIC SERVICES
Three Empire State Plaza
Albany, NY. 12223-1350

Dwane Glancy, Treasurer
SMITHVILLE TELEPHONE COMPANY
1600 West Temerance Street
Ellettsville, IN. 47429

Bruce Beard
Attorney for
SOUTHWESTERN BELL MOBILE SYSTEMS
17330 Preston Road
Suite 100A
Dallas, TX. 75252

James D. Ellis
Robert M. Lynch
Wayne Watts
David F. Brown
Attorneys for
SBC COMMUNICATIONS, INC.
175 E. Houston, Room 1254
San Antonio, TX. 78205

Jeffrey S. Bork
Robert B. McKenna
U S WEST, INC.
1020 19th Street, N.W.
Suite 700
Washington, D.C. 20036

David R. Poe
Catherine P. McCarthy
Yvonne M. Coviello
Attorneys for
TIME WARNER COMMUNICATIONS
HOLDING, INC.
LeBoeuf, Lamb, Greene & MacRae, L.L.P.
1875 Connecticut Ave., N.W.
Washington, D.C. 20009-5728

Richard P. Thayer, President
James A. Sanborn, Controller
UNION TELEPHONE COMPANY
13 Central Street
P. O. Box 577
Farmington, N.H. 03835

David M. Wilson, Esq.
Attorney for
THE WESTLINK COMPANY
Young, Vogl, Harlick, Wilson & Simpson LLP
425 California Street
Suite 250
San Francisco, CA. 94104

Kevin C. Gallagher
Senior Vice President-General Counsel and
Secretary
360° COMMUNICATIONS COMPANY
8725 Higgins Road
Chicago, IL. 60631

Charles C. Hunter
Laura C. Mow
Terry F. Berman
Attorneys for
TELECOMMUNICATIONS RESELLERS
ASSOCIATION
Hunter & Mow, P.C.
1620 I Street, N.W., Suite 701
Washington, D.C. 20006

Donald F. Sheppard
TIME WARNER COMMUNICATIONS
HOLDING, INC.
300 First Stamford Place
Stamford, CT. 06902-6732

Mary McDermott
Linda Kent
Charles D. Cosson
Attorneys for
UNITED STATES TELEPHONE
ASSOCIATION
1401 H. Street, N.W., Suite 600
Washington, D.C. 20005

Jonathan M. Chambers
Vice President of Public Affairs
SPRINT SPECTRUM, L.P.
1801 K Street, N.W.
Suite M-112
Washington, D.C. 20036

Jonathan D. Blake, Kurt A. Wimmer
Gerald J. Waldron, John F. Duffy
Donna M. Epps: Attorneys for
SPRINT SPECTRUM and AMERICAN
PERSONAL COMMUNICATIONS
Covington & Burling
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20044

R. Michael Senkowski
Jeffrey S. Linder
Stephen J. Rosen
Attorneys for, PERSONAL
COMMUNICATIONS INDUSRTY ASSOC.
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

David L. Nace
Attorney for
ALLIANCE OF WIRELESS SERVICES
PROVIDERS
Lukas, McGowan, Nace & Gutierrez, Chtd.
1111 19th Street, N.W., 12th Floor
Washington, D.C. 20036

Lewis J. Paper
David B. Jeppsen
Attorneys for
CELLULAR RESELLERS ASSOCIATION
Dickstein, Shapiro & Morin, L.L.P.
2101 L Street, N.W.
Washington, D.C. 20037-1526

Leonard J. Kennedy
Laura H. Phillips
Peter A. Batacan
Attorneys for COMCAST CORPORATION
Dow, Lohnes & Albertson
1200 New Hampshire Ave., N.W.
Suite 800
Washington, D.C. 20036-6802

Mark J. Golden
Vice President-Industry Affairs
Robert Cohen
PERSONAL COMMUNICATIONS
INDUSTRY ASSOCIATION
500 Montgomery Street, Suite 700
Alexandria, VA. 22314-1561

Peter Arth, Jr., Edward W. O'Neill
Mary Mack Adu
Attorneys for
THE PEOPLE OF THE STATE OF
CALIFORNIA and PUBLIC UTILITIES
COMMISSION OF THE SATE OF
CALIFORNIA
505 Van Ness Ave.
San Francisco, CA. 94102

John F. Beasley
William B. Barfield
Jim O. Llewellyn
BELLSOUTH CORPORATION
1155 Peachtree Street, N.E.
Suite 1800
Atlanta, GA. 30309-2641

Richard Rubin
Steven N. Teplitz
Attorneys for
CENTENNIAL CELLULAR CORP.
Fleischman and Walsh, L.L.P.
1400 16th Street, Suite 600
Washington, D.C. 20036

Danny E. Adams
Edward A. Yorkgitis, Jr.
Attorneys for
THE COMPETITIVE
TELECOMMUNICATIONS ASSOCIATION
Kelley, Drye & Warren
1200 Nineteenth Street, N.W., Suite 500
Washington, D.C. 20036

Genevieve Morelli
Vice President and General Counsel
THE COMPETITIVE
TELECOMMUNICATIONS ASSOCIATION
1140 Connecticut Avenue, N.W., Suite 220
Washington, D.C. 20036

Robert A. Hart IV,
Owner of HART ENGINEERS and
CEO of 21st CENTURY TELESIS, INC.
4615 North Boulevard
Baton Rouge, LA. 70806

Jeanne M. Walsh
Attorney for
NORTH CAROLINA 4 CELLULAR LIMITED
PARTNERSHIP
Kurtis & Associates, P.C.
2000 M Street, N.W.
Suite 600
Washington, D.C. 20036

Richard L. Oberdorfer
President
WESTERN RADIO SERVICES CO., INC.
Haley, Bader & Potts
Suite 900
4350 North Fairfax Drive
Arlington, VA. 22203-1633

Scott K. Morris
Cathleen A. Massey
AT & T WIRELESS SERVICES, INC.
1150 Connecticut Avenue, N.W.
4th Floor
Washington, D.C. 20036

Mark C. Rosenblum
Judy Sello
Attorneys for
AT & T WIRELESS SERVICES, INC.
Room 3244J1
295 North Maple Avenue
Basking Ridge, NJ. 07920

Joe D. Edge
Mark F. Denver
Attorneys for
PUERTO RICO TELEPHONE CO.
Drinker Biddle & Reath
901 Fifteenth Street, N.W.
Washington, D.C. 20005

J. Manning Lee
Vice President, Regulatory Affairs
TELEPORT COMMUNICATIONS GROUP,
INC.
Two Teleport Drive, Suite 300
Staten Island, NY. 10311

Michael R. Bennet
Caressa D. Bennet
Attorneys for
CELLULAR MOBIL SYSTEMS OF ST. CLOUD
GENERAL PARTNERSHIP
Bennet & Bennet, PLLC
1831 Ontario Place, NW, Suite 200
Washington, D.C. 20009

James F. Rogers
Steven H. Schulman
Attorneys for
VANGUARD CELLULAR SYSTEMS, INC.
Latham & Watkins
1001 Pennsylvania Avenue, N.W.
Suite 1300
Washington, D.C. 20004

Jay L. Birnbaum
David H. Pawlik
Attorneys for
CELLULAR COMMUNICATIONS OF
PUERTO RICO, INC.
Skadden, Arps, Slate, Meagher & Flom
1440 New York Ave., N.W.
Washington, D.C. 20005

Richard P. Ekstrand, President
RURAL CELLULAR CORPORATION
P. O. Box 1027
2819 Highway 29 South
Alexandria, MN. 56308

James A. Crary
Senior Attorney
ANCHORAGE TELEPHONE UTILITY
600 Telephone Avenue
Anchorage, Alaska 99503

Richard S. Myers
Attorney for
SOUTHEAST TELEPHONE LIMITED
PARTNERSHIP, LTD.
Myers, Keller Communications Law Group
1030 15th Street, N.W., Suite 908
Washington, D.C. 20005

William D. Baskett III
Thomas E. Taylor
David S. Bence
Attorneys for
CINCINNATI BELL TELEPHONE COMPANY
2500 PNC Center
201 East Fifth Street
Cincinnati, OH. 45201-5715

Emily C. Hewitt, General Counsel
Vincent L. Crivella, Assoc. General Counsel
Michael J. Ettner, Sr. Asst. General Counsel
Jody B. Burton, Asst. General Counsel
GENERAL SERVICES ADMINISTRATION
18th & F Streets, N.W.
Room 4002
Washington, D.C. 20405

James Rowe, Executive Director
ALASKA TELEPHONE ASSOCIATION
4341 B Street
Suite 304
Anchorage, Alaska 99503

Lisa M. Zaina
General Counsel
Ken Johnson
Regularoty and Legislative Analyst
OPASTCO
21 Dupont Circle, NW
Washington, D.C. 20036

David L. Hill
Audrey P. Rasmussen
Attorneys for
FLORIDA CELLULAR RSA LIMITED
PARTNERSHIP
O'Connor & Hannan, L.L.P.
191 Pennsylvania Ave., N.W., Suite 800
Washington, D.C. 20006-3483

Carl W. Northrop
Christine M. Crow
Attorneys for
ARCH COMMUNICATIONS GROUP, INC.
Bryan Cave LLP
700 Thirteenth Street, N.W.
Suite 700
Washington, D.C. 20005-3960

Catherine R. Sloan
Richard L. Fruchterman
Richard S. Whitt
Attorneys for
LDDS WORLDCOM
1120 Connecticut Avenue, N.W.
Suite 400
Washington, D.C. 20036

Gene Dejordy, Esq.
Christopher Johnson
WESTERN WIRELESS CORPORATION
330 120th Ave., N.E.
Suite 200
Bellevue, WA. 98005

Steven Watkins, Sr. Industry Specialist
David Cosson
L. Marie Guillory
Attorneys for
NATIONAL TELEPHONE COOPERATIVE
ASSOCIATION
2626 Pennsylvania Avenue, N.W.
Washington, D.C. 20037

John Hearne, Chairman
POINT COMMUNICATIONS COMPANY
100 Wilshire Boulevard, Suite 1000
Santa Monica, California 90401